

JOHN R. MANNING
Attorney at Law
4005 Manzanita Ave, Suite 6-8
Carmichael, CA 95608
(916)-444-3994
jmanniglaw@yahoo.com

Attorney for defendant
Carlos Lee Sanchez, Jr.

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

RICKY LEE WARE,
KIMBERLY ANN WALLACE and
CARLOS LEE SANCHEZ, JR.,

Defendants.

CASE NO. 2:24-CR-281-DAD

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
ORDER

DATE: April 28, 2025
TIME: 9:30 a.m.
COURT: Hon. Dale A. Drozd

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendants, by and through defendant's counsel of record, hereby stipulate as follows:

1. This case is set for a status conference on April 28, 2025.

2. By this stipulation, defendants now move to continue the status conference until June 23, 2025, and to exclude time between April 28, 2025, and June 23, 2025, under 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4].

3. The parties agree and stipulate, and request that the Court find the following:

a) The government has produced discovery in this matter, to date, consisting of over 52,000 pages of investigative reports, photographs and video surveillance evidence and 3000 native files. The government has further indicated, on or about April 16, 2025, they will begin producing (electronic) copies and/or extraction reports related to the eight seized electronic

1 devices (adding a significant volume of discovery to the already substantial amount of discovery
2 previously produced by the government).

3 b) Counsel for defendants have met with their clients to discuss their respective
4 cases. Defense counsel desire additional time to conduct investigation into the charges, the
5 alleged roles of their respective clients, and to review discovery in this case. Defense counsel
6 will need additional time to discuss potential resolutions with their clients, prepare pretrial
7 motions, and otherwise prepare for trial.

8 c) Counsel for defendants believe that failure to grant the above-requested
9 continuance would deny them the reasonable time necessary for effective preparation, taking into
10 account the exercise of due diligence.

11 d) The government does not object to the continuance.

12 e) Based on the above-stated findings, the ends of justice served by continuing the
13 case as requested outweigh the interest of the public and the defendant in a trial within the
14 original date prescribed by the Speedy Trial Act.

15 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
16 et seq., within which trial must commence, the time period of April 28, 2025 to June 23, 2025,
17 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]
18 because it results from a continuance granted by the Court at defendant's request on the basis of
19 the Court's finding that the ends of justice served by taking such action outweigh the best interest
20 of the public and the defendant in a speedy trial.

21 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the
22 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial
23 must commence.

24 IT IS SO STIPULATED.

25
26 Dated: April 17, 2025

27 /s/ LINDA PARISI
28 LINDA PARISI
Counsel for Defendant
RICKY LEE WARE

1 Dated: April 17, 2025

/s/ CANDICE L. FIELDS
CANDICE L. FIELDS
Counsel for Defendant
KIMBERLY ANN WALLACE

4 Dated: April 17, 2025

/s/ JOHN R. MANNING
JOHN R. MANNING
Counsel for Defendant
CARLOS LEE SANCHEZ, Jr

8 Dated: April 17, 2025

MICHELE BECKWITH
Acting United States Attorney

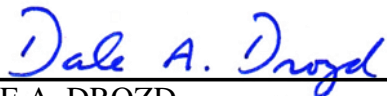
/s/ NICHOLAS M. FOGG
NICHOLAS M. FOGG
Assistant United States Attorney

12 **ORDER**

14 Pursuant to the stipulation of the parties and good cause appearing, the status conference
15 scheduled for April 28, 2025, is continued to June 23, 2025, at 9:30 a.m. and time is excluded between
16 April 28, 2025, and June 23, 2025, under 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4].

17 IT IS SO ORDERED.

18 Dated: April 18, 2025


DALE A. DROZD
UNITED STATES DISTRICT JUDGE